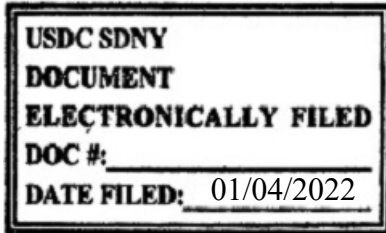


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December 30, 2021

VIA ECF

Honorable Barbara Moses
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 100071

MEMO ENDORSED

Re: *Zaida Borges v. Commissioner of Social Security*,
Civil Action No. 1:20-cv-09748-GBD-BCM

Dear Judge Moses,

We write on behalf of plaintiff, Zaida Borges, and with the consent of the defendant, to request a 14-day extension of time to file plaintiff's reply brief. The current due date is January 3, 2022. Plaintiff respectfully requests an extension of time up to and including January 17, 2022.

While counsel had every expectation of meeting the January 3, 2022 deadline, the additional time is necessary because the attorney working on the brief just tested positive for COVID on December 29, 2021, one day after her husband tested positive. Both parents are experiencing mild symptoms and at least one, if not both, of their two young children also have contracted COVID. We also are a small office and have other cases with several briefs due over the next two weeks.

Subject to the approval of the Court, the parties propose the following revised briefing schedule, including events already passed:

- a. Plaintiff filed her motion for judgment on the pleadings on October 13, 2021;

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December 30, 2021
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b. Defendant filed its response/cross-motion on December 13, 2021;
and

c. Plaintiff to file her reply (if any) on or before **January 17, 2022.**

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Joseph Anthony Pantoja, Esq. (by ECF)

Application GRANTED. SO ORDERED.



Barbara Moses
United States Magistrate Judge
January 4, 2022